

REMARKS

In the Office Action, the disclosure was objected to due to certain informalities, and claims 36-41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Glenn ("Glenn," U.S. Pat. No. 6,150,193) in view of Igarashi et al. ("Igarishi," U.S. Pat. No. 6,262,487). In this Response, Applicants have addressed the Examiner's objection, have traversed the standing rejection, and have amended claim 36 to correct certain informalities. Accordingly, claims 36-41 will be pending after its entry.

I. **Objection to the Disclosure**

The disclosure stands objected to because of certain informalities. Specifically, the Examiner stated that related application information should be updated, and the meaning of """ and "°" throughout the specification should be clarified.

Applicants have included a Notice of Related Cases with this Response. The Notice provides information on particular applications bearing some relationship to the instant application. As to the meanings of """ and "°," they are formatting symbols for quotation marks (") and a degree symbol (°) respectively.

II. **Claim Rejections**

A. **Rejection of Claims 36-41 Under 35 U.S.C. § 103(a)**

Claims 36-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Glenn in view of Igarishi. Claim 36 has been amended to correct certain informalities. Applicants respectfully traverse the rejection with arguments presented below.

1. **A Summary of the Examiner's Argument**

In the Office Action dated 07/08/2003, the Examiner states that Glenn (figures 7-9 and 13b) discloses a package having the following attributes, among others: 1) a metal layer comprising at least two pairs of conductors; 2) the pair of conductors includes a first wire

deposited in a Manhattan direction relative to the boundaries of the IC and a second wire deposited in a different Manhattan direction; 3) and the pair of conductors have the same effective wiring direction (*i.e.*, angle “A”).

2. Glenn Does Not Disclose Such a Metal Layer

In reviewing figures 7-9 and 13b, Applicants note there is not a single conductor shown that includes a first wire deposited in a Manhattan direction coupled to a second wire deposited in a different Manhattan direction. In other words, there is not a single conductor shown that includes a first wire that is perpendicular to a depicted boundary coupled to a second wire that is perpendicular to the first wire. Furthermore, there is not a single pair of conductors as described in the preceding two sentences that have the same effective wiring direction.

3. A Package Is Not an Integrated Circuit

Glenn, by the Examiner’s own admission, does not teach all the subject claim limitations. Claim 36 is directed to an integrated circuit. Although in the preamble, the recitation “integrated circuit” breathes structural life into the claim and must accordingly be considered a claim element. Glenn does not show an integrated circuit as described in the subject claims.

Furthermore, the Examiner does not state how Glenn suggests all the subject claim limitations. Even if one placed an integrated circuit into the reported semiconductor device package—as pointed to by the Examiner on page 4, lines 3 to 5—one would not arrive at Applicants’ invention. Applicants’ invention is an integrated circuit as recited in claims 36-41; it is not a combination of an integrated circuit and a semiconductor device package that includes material limitations from the subject claims.

4. A *Prima Facie* Case of Obviousness Has Not Been Made

“To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the

knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.” MPEP 2143.

Applicants respectfully contend that a *prima facie* case of obviousness has not been made, since the cited art does not disclose all limitations of the subject claims.

B. The Rejection Under 35 U.S.C. § 103(a) Should Be Withdrawn

Because a *prima facie* case of obviousness has not been made, the rejection of claims 36-41 should be withdrawn.

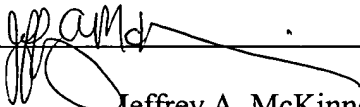
CONCLUSION

In view of the foregoing, it is submitted that the claims are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

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